

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

BARCO, INC. and BARCO NV,

Plaintiffs,

v.

YEALINK (USA) NETWORK  
TECHNOLOGY CO., LTD., and  
YEALINK NETWORK  
TECHNOLOGY CO., LTD.

Defendants.

Case No. 2:23-CV-00521-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF ERIK J. HALVERSON IN SUPPORT OF OPPOSITION TO  
DEFENDANTS' *DAUBERT* MOTION TO STRIKE OPINIONS OF DR. BROGIOLI**

I, Erik J. Halverson, hereby declare as follows:

1. I am a partner at the law firm of K&L Gates LLP and counsel for Plaintiffs Barco, Inc. and Barco NV (collectively, "Plaintiffs"). I have personal knowledge of the facts set forth in this Declaration and if called upon as a witness, I could and would testify to such facts under oath.

2. Attached as **Exhibit A** are true and correct excerpts from the June 10, 2025 deposition of Michael C. Brogioli, Ph.D.

3. Attached as **Exhibit B** are true and correct excerpts from the April 13, 2025 deposition of Dunxiong Cai.

4. Attached as **Exhibit C** is a true and correct copy of Yealink's firmware update status webpage, produced by Plaintiffs in this case with bates number BARCO\_0067469.

5. Attached as **Exhibit D** are true and correct excerpts from the April 25, 2025 deposition of Erwin Six.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 1, 2025 in San Francisco, CA.

/s/ Erik J. Halverson  
Erik J. Halverson

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document and accompanying Exhibits were filed electronically in compliance with Local Rule CV-5(a) and served via email on all counsel of record on July 1, 2025.

/s/ Erik J. Halverson

**CERTIFICATE OF AUTHORIZATION TO SEAL**

I hereby certify that pursuant to Local Rule CV-5(a)(7), the foregoing document and accompanying Exhibits were filed under seal pursuant to the Court's Protective Order entered in this matter (Dkt. 30).

/s/ Erik J. Halverson